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Attorneys for Plaintiffs, District Council 16 Northern California  
Health And Welfare Trust Fund, et al.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

DISTRICT COUNCIL 16 NORTHERN  
CALIFORNIA HEALTH AND WELFARE TRUST  
FUND, et al.,

Plaintiffs,

v.

USAL PAINTING, LLC, a Suspended California  
limited liability company; and ALEXANDER  
ERNESTO NAVARRO, an individual and also dba  
ALEXANDER ERNESTO NAVARRO,

Defendants.

Case No. 4:19-cv-05071 HSG

**REQUEST TO CONTINUE CASE  
MANAGEMENT CONFERENCE;  
~~[PROPOSED]~~ ORDER THEREON**

Date: November 19, 2019  
Time: 2:00 p.m.  
Location: Courtroom 2, 4th Floor  
1301 Clay Street  
Oakland, CA 94612  
Judge: Honorable Haywood S.  
Gilliam, Jr.

Plaintiffs respectfully request that the Case Management Conference, currently on calendar for November 19, 2019, be continued for approximately thirty (30) days. Good cause exists for the granting of the continuance, as follows:

1. As the Court's records will reflect, this action was filed on August 16, 2019 (Dkt. #1). Defendants were personally served on September 19, 2019, and a Proof of Service of Summons was filed with the Court on September 23, 2019 (Dkt. #11).

2. After filing the Complaint, Defendants contacted Plaintiffs and advised they were interested in resolving the matter informally. Defendants submitted the missing fringe benefit

1 contribution reports. The Parties have reached an agreement where Defendants will enter into a payment  
2 plan with Plaintiffs in the form of a Stipulated Judgment. The Stipulated Judgment has been sent to  
3 Defendants and is pending signature. Defendants have stated that the executed Stipulated Judgment will  
4 be provided to Plaintiffs on November 8, 2019.

5 3. Based on the foregoing, and as Defendants have not yet filed an appearance and the  
6 parties are attempting to resolve this matter without the need for further litigation, there are no issues  
7 that need to be addressed by this Court at the upcoming Case Management Conference. In the interest of  
8 conserving costs, as well as the Court's time and resources, Plaintiffs respectfully request that the  
9 upcoming Case Management Conference be continued for thirty (30) days to allow for the Parties to  
10 execute and file the Stipulated Judgment.

11 I declare under penalty of perjury that I am the attorney for the Plaintiffs in the above entitled  
12 action, and that the foregoing is true of my own knowledge.

13 DATED: November 8, 2019

SALTZMAN & JOHNSON LAW CORPORATION

14 By: \_\_\_\_\_/S/

15 Luz E. Mendoza

16 Attorneys for District Council 16 Northern California  
17 Health And Welfare Trust Fund, et al.

18 T IS SO ORDERED.

19 The currently set Case Management Conference is hereby continued to  
20 December 17, 2019 at 2:00 p.m., and all previously set deadlines and dates  
21 related to this case are continued accordingly.  
22

23 DATED: 11/12/2019

24  
25   
26 UNITED STATES DISTRICT JUDGE  
27  
28